

EXHIBIT 15

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

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IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES MDL NO. 16-2738
PRACTICES, AND PRODUCTS LIABILITY (FLW) (LHG)
LITIGATION

This Document Relates to All

Cases and Also to:

Case No.

1422-CC09326-03

Valerie Swann v. Johnson &

Division 10

Johnson, et al.,

ATTORNEYS EYES ONLY DESIGNATION

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FRIDAY, OCTOBER 1, 2021

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In-Person Stenographic Deposition of REBECCA SMITH-BINDMAN, M.D., conducted at the La Meridian Hotel, 333 Battery Street, San Francisco, California, beginning at 9:40 a.m. Pacific Time, before Sandra Bunch VanderPol, FAPR, RMR, CRR, CSR #3032

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1 you know, at any trial or hearing? I mean, what you
2 did, what your findings were?

3 MS. O'DELL: Object to the form.

4 THE WITNESS: If I'm asked about it, I would
5 be happy to talk about it.

6 BY MR. ZELLERS:

7 Q. Same question: If the study is published, I
8 assume you'll talk about it; is that right?

9 A. If I'm asked about it, I'm happy to talk
10 about it.

11 Q. All right. Just a couple of other
12 questions.

13 You decided, with respect to your
14 unpublished study, not to do any analysis of
15 dose-response; is that right?

16 A. Yes.

17 MS. O'DELL: So, Mike, your time is up. I'm
18 happy to let you go back to clarify, but your time is
19 up. You could have saved time for redirect. So if
20 you're going to go into different questions --

21 MR. ZELLERS: That's not a different
22 question.

23 MS. O'DELL: It is a different area of
24 inquiry for --

25 MR. ZELLERS: You asked her specifically